

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**John Malone,
Debtor**

**Chapter 13
Case No. 24-10885-CJP**

STATEMENT OF DEBTOR'S COUNSEL/SUPPLEMENTAL TO MOTION FOR SALE

Debtor was ordered to file a supplement to his Motion to Sell. Myself or my colleague have reviewed all of the counter-offers with Debtor, advised him to speak to a real estate agent (I provided him the name of a real estate agent in his area), discussed selling the property outright (without a life estate), discussed other options such as a reverse mortgage, advised him to speak to new real estate counsel (Debtor obtained a real estate attorney), advised him to speak to an elder law attorney (I provided him the name of a potential attorney), and Attorney Puliafico and I have both advised the Debtor that we do not believe the offer he wants to accept is in his best interests.

Despite these options and the information we provided him, Debtor wants to proceed with the original Motion to Sell and original Purchase and Sale Agreement dated December 17, 2024 and filed with the docket with the Motion for Sale (Document 106) for \$240,000.00 plus a life estate. Debtor has maintained this same position after multiple conversations and meetings with him during the past few weeks.

Therefore, Debtor's counsel, John Ullian, requests that the Court act on the original Motion for Sale.

Respectfully submitted

Date: May 22, 2025

/s/ John Ullian
John Ullian, Esq.
The Law Firm of Ullian and Associates, P.C.
220 Forbes Road, Suite 106
Braintree, MA 02184
(781) 848-5980
BBO #542772

CERTIFICATE OF SERVICE

I, Amy Puliafico, hereby certify under the pains and penalties of perjury that I served **Statement of Debtor's Counsel/Supplement to Motion for Sale** by ECF or mailing a copy of same, postage prepaid, to the interested parties listed below and on the attached Matrix.

John Fitzgerald, Office of the US Trustee
JW McCormack Post Office & Courthouse
5 Post Office Square, 10th Floor, Suite 1000
Boston, MA 02109

Carolyn Bankowski
Chapter 13 Trustee
PO Box 8250
Boston, MA 02114

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

28 Berkshire Ave LLC
Peter Pasciucco
50 Redfield Street, Suite 201
Boston, MA 02122

American Building Construction, Inc.
82 Union St.
Quincy, MA 02169

Chloe, LLC
c/o Ehrhard & Associates, P.C.
27 Mechanic Street, Suite 101
Worcester, MA 01068

Federal Home Loan Mortgage Corporation
Jason Giguere
Zwicker & Associates, P.C.
80 Minuteman Road
Andover, MA 01810

Federal Home Loan Mortgage Corporation
Joseph Dolben
Harmon Law Offices, P.C.
150 California Street
Newton, MA 02458

Federal Home Loan Mortgage Corporation
Brian M Kiser
Marinosci Law Group, P.C.
275 West Natick Road, Suite 500
Warwick, RI 02886

The Bank of New York Mellon
Marcus Pratt
Korde & Associates, P.C.
900 Chelmsford Street
Suite 3102
Lowell, MA 01851

Date: May 22, 2025

/s/ John Ullian
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Document Page 3 of 3

Label Matrix for local noticing
0101-1
Case 24-10885
District of Massachusetts
Boston
Thu May 8 09:06:01 EDT 2025

American Building Construction, Inc.
82 Union St.
Quincy, MA 02169-6973

Chloe, LLC
c/o Ehrhard & Associates, P.C.
27 Mechanic Street, Suite 101
Worcester, MA 01068 United States 01608

Boston
U. S. Bankruptcy Court
J.W. McCormack Post Office & Court House
5 Post Office Square, Suite 1150
Boston, MA 02109-3945

Attn: Massachusetts Dept. of Revenue
Bankruptcy Unit
PO Box 7090 Boston, MA 02204

Bank of America, N.A.
475 Cross Point Pk
Getzville, NY 14068-1609

Boston Water and Sewer Commission
980 Harrison Avenue
Boston, MA 02119-2530

Boston Water and Sewer Commission
P.O. Box 55466
Boston, MA 02205-5466

City of Boston Real Estate Tax
CITY OF BOSTON, BOX 55808
Boston, MA 02205

Discover Bank
2479 Edison Blvd, Unity A
Twinsburg, OH 44087-2475

Fed Home Loan Mortgage Corp as Trustee
26 Savin Hill Ave
Dorchester, MA 02125-4099

Fed Home Loan Mortgage Corp as Trustee
c/o Specialized Loan Servicing
P.O. Box 636005
Littleton, CO 80163-6005

Federal Home Loan Mortgage Corp. Trustee (Se
c/o Newrez LLC
dba Shellpoint Mortgage Servicing
(fka Specialized Loan Servicing LLC)
6200 S. Quebec Street, Suite 300
Greenwood Village, Colorado 80111-4720

Federal Home Loan Mortgage Corp. Trustee for
Freddie Mac Seasoned Credit Risk
c/o Shellpoint Mortgage Servicing
PO Box 10826 Greenville
Greenville, SC 29603-0826

National Grid
P.O. Box 371338
Pittsburgh, PA 15250-7338

Specialized Loan Servicing, LLC
Specialized Loan Servicing LLC
P.O. Box 636005
Littleton, CO 80163-6005

The Bank of NY Mellon Indenture Trustee
c/o Bank of America, N.A.
475 Cross Point Pkwy PO Box 9000
Getzville, NY 14068-9000

The Bank of New York Mellon
c/o Bank of America, N.A.
P.O. Box 31785
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Carolyn Bankowski-13-12
Chapter 13-12 Trustee Boston
P. O. Box 8250
Boston, MA 02114-0950

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28 Savin Hill Avenue
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John A. Ullian
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Richard King - B
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Boston, MA 02109-3934

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)28 Berkshire Ave LLC

(u)Federal Home Loan Mortgage Corporation, as

(u)The Bank of New York Mellon FKA The Bank